

United States District Court

SouthernDISTRICT OF Ohio

UNITED STATES OF AMERICA

V.

Daniel ABRAHAM

CRIMINAL COMPLAINTCASE NUMBER: 2:08-mj-292

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 9, 2008 in Franklin County, in the Southern District of Ohio defendant(s) did, (Track Statutory Language of Offense)

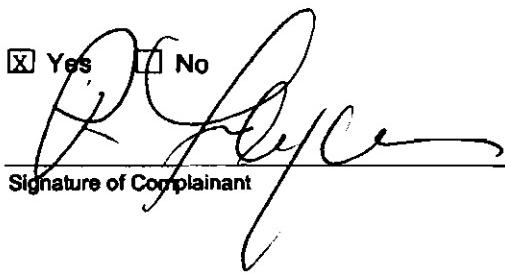
Unlawfully conspired to possess with intent to distribute more than 100 kilograms of marijuana, a Schedule I controlled substance.

in violation of Title 21 United States Code, Section 846,

I further state that I am a(n) DEA Special Agent and that this complaint is based on the following facts: See Attached Affidavit

Continued on the attached sheet and made a part

Yes No

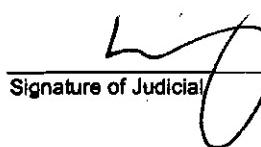

Signature of Complainant

Sworn to before me, and subscribed in my presence,

Date 6/11/08

at Columbus, Ohio
City and State

Norah McCann King, U.S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial

I, Patrick Flynn, having been duly sworn depose and state:

1. I am a Special Agent of the Drug Enforcement Administration (DEA) assigned to the Detroit Field Division, Columbus District Office. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18 United States Code, Section 2516(1). I have been a Special Agent of the DEA for approximately eight years, during which time I have participated in numerous investigations involving narcotics trafficking. I have received specialized training in the subject of narcotics trafficking and money laundering from the DEA and have been personally involved in investigations concerning the possession, manufacture, transportation, distribution and importation of controlled substances, as well as methods used to finance drug transactions. The information set forth in this affidavit comes from my personal involvement in this investigation, as well as information provided to me by other law enforcement officers.

2. During April 2008, law enforcement received information from a reliable cooperating source that semi-tractor trailers had used 2858 Banwick Road, Columbus, Ohio to offload large quantities of marijuana. A second reliable source indicated that in the fall of 2007 Donald DAILEY picked up approximately 1000 pounds of marijuana from 2858 Banwick Road, Columbus, Ohio. On March 14, 2008 federal agents seized approximately 2,000 pounds of marijuana, and \$3,500,000.00 from Donald DAILEY's house. The warehouse at 2858 Banwick Road, Columbus, Ohio is rented in the name of DOZIERE

DEVELOPMENT GROUP. From 2003 through October 2007 Donald DAILEY received \$257,708.00 in checks payable to him from DOZIERE DEVELOPMENT GROUP.

3. On June 9, 2008, at approximately 10:00 a.m., law enforcement conducted a drive-by surveillance of 2858 Banwick Road, Columbus, Ohio. During the surveillance, law enforcement observed a white tractor trailer, Oklahoma license plate 3469GG, at the warehouse. Law enforcement later observed the tractor trailer leave the warehouse. Law enforcement followed the tractor trailer to the Flying J located at Interstate 70 and SR 158. Law enforcement approached the two occupants, identified as Kenneth WAKEFIELD and Joseph ERDMAN. Both gave conflicting statements to law enforcement. An exterior canine sniff resulted in a positive indication on the tractor trailer. A search of the trailer has resulted in the seizure of approximately \$100,000 in U.S Currency. A canine made a positive alert as to the scent of narcotics on the currency, and to boxes of lettuce contained inside the trailer.

4. At approximately 12:00 p.m., law enforcement observed a black Dodge Ram pick-up, Ohio license plate DOP-4571, registered to Daniel ABRAHAM, 4777 Heaton Road, Columbus, Ohio, and a white minivan, Ohio license plate DCD-5485, registered to Keith FRANKLIN, 2248 Blackoak Avenue, Columbus, OH, arrive at the warehouse. The white minivan backed up to the loading dock door. Law enforcement observed one of the occupants of the black Ram unlock the door and enter the warehouse office.

5. At approximately 12:20 p.m., surveillance observed both vehicles leave the warehouse in tandem. The minivan, occupied by ABRAHAM (driver), and Charles Thomas FERGUSON (passenger) was followed to the Red Lobster on Hamilton Road and Interstate 70, where ABRAHAM, and FERGUSON entered the restaurant. Shortly thereafter, the black Dodge Ram truck, driven by Ronald A. JACOBS, arrived at the Red Lobster, and JACOBS entered the establishment. A Columbus Division of Police canine (K-9) unit was called to the scene to conduct an exterior sniff of the white minivan. As the canine unit pulled into the Red Lobster Restaurant parking lot, law enforcement observed ABRAHAM and FERGUSON run out of the restaurant on foot, and law enforcement made pursuit. An exterior sniff of the minivan resulted on a positive indication for the scent of narcotics on the vehicle. A search of the vehicle resulted in the seizure of approximately 1,200 pounds of marijuana.

6. Law enforcement officials apprehended, and arrested FERGUSON, and arrested Ronald A. JACOBS, who remained inside the Red Lobster Restaurant. ABRAHAM was not apprehended, and is still at large.

7. Based upon this information, your affiant believes probable cause exists that Daniel ABRAHAM, Charles Thomas FERGUSON, and Ronald A. JACOBS violated 21 U.S.C. 846, conspiracy to possess with intent to distribute marijuana more than 100 kilograms of marijuana.



Patrick Flynn
Special Agent
Drug Enforcement Administration

Subscribed and Sworn to before me
this 11th day of June, 2008.



Norah McCann King
U.S. Magistrate Judge
Southern District of Ohio